

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

---

SILAS CALHOUN and EMILY CALHOUN,  
Individually and as Parents and Next Friends  
of ESTELLA CALHOUN,

Plaintiff,

v.

UNITED STATES OF AMERICA

Defendant.

---

**Civil Action No. 04-10480-RGS**

**JOINT MOTION FOR ENLARGEMENT OF TIME  
TO COMPLETE DISCOVERY**

The parties, by and through their attorneys, hereby move this Court for an enlargement of time to complete discovery. Good cause exists for this motion.

The subject plaintiff and her parents do not reside in the jurisdiction, but in Hawaii due to Silas Calhoun's active duty in the armed forces. Although the parties have completed substantial fact discovery and depositions, the case involves complex medical issues that will require careful evaluation and consideration, including proposed expert testing and evaluation of the subject plaintiff in Hawaii, and the completion of educational needs evaluations. For these reasons the following adjustments to the completion of discovery are proposed.

1. Plaintiffs' expert disclosures by July 31, 2006.
2. Defendants' expert disclosures by September 30, 2006.
3. Expert discovery completed by November 17, 2006.
4. Motions for summary disposition due by December 15, 2006.

This Motion is made in good faith and is not made to delay the action, or for any other improper purpose.

For the Plaintiffs,

Silas and Emily Calhoun,  
Estella Calhoun,

For the Defendant,

UNITED STATES OF AMERICA

MICHAEL J. SULLIVAN  
United States Attorney

/s/ Michael S. Appel (By: APG) 4/14/2006

Michael S. Appel, BBO# 543898  
Anthony V. Agudelo, BBO# 642260  
Sugarman, Rogers, Barshak & Cohen, P.C.  
101 Merrimac Street, 9<sup>th</sup> Floor  
Boston, MA 02114  
617-227-3030

By /s/ Anton P. Giedt 4/14/2006

: Anton P. Giedt  
Assistant U.S. Attorney  
1 Courthouse Way  
Boston, MA 02210  
617-748-3309 (Voice)  
617-748-3971 (Fax)  
[anton.giedt@usdoj.gov](mailto:anton.giedt@usdoj.gov)

**CERTIFICATE OF SERVICE**

Suffolk, ss.

Boston, Massachusetts  
DATE: 4/14/2006

I, Anton P. Giedt, Assistant U.S. Attorney, do hereby certify that I have this day served a copy of the foregoing upon the Plaintiffs' counsel of record by Electronic Filing.

/s/ Anton P. Giedt  
Anton P. Giedt  
Assistant U.S. Attorney

**PLAINTIFFS' COUNSEL:**

Michael S. Appel  
Anthony V. Argudelo  
Sugarman, Rogers, Barshak & Cohen, P.C.  
101 Merrimac Street  
Boston, MA 02110  
617-227-3030 (Voice)  
617-523-4001 (Fax)  
[appel@srbc.com](mailto:appel@srbc.com)

**AGENCY COUNSEL:**

Joseph Pollard, Captain, USAF  
U.S. S Department of the Air Force  
Air Force Legal Services Agency  
1501 Wilson Boulevard, Room 835  
Arlington, VA 22209-2403  
703-696-9020 (Voice)